

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION

JOSEPH MUNDY,

Plaintiff,

v.

YELLOW TRANSPORTATION COMPANY, INC.,  
SHORT-TERM DISABILITY PLAN, Designated for  
Employees of Yellow Transportation, Inc.; YELLOW  
TRANSPORTATION COMPANY, INC. LONG-  
TERM DISABILITY PLAN, Designated for  
Employees of Yellow Transportation, Inc.; CIGNA  
CORPORATION, in its capacity as Administrator of  
the Plans;

Defendants.

Case No.: 08 C 1576

Judge Bucklo

Magistrate Judge Valdez

**AGREED MOTION FOR EXTENSION OF TIME**

Defendants, LIFE INSURANCE COMPANY OF NORTH AMERICA (“LINA”), and YELLOW ROADWAY CORPORATION LONG-TERM DISABILITY INSURANCE PLAN (“LTD Plan”), by their undersigned counsel, respectfully move this Honorable Court for a six day extension of time, from June 19, 2008 to June 25, 2008, to answer plaintiff’s complaint, stating as follows:

1. The answer of LINA and the LTD Plan is due June 19, 2008, with three prior extensions that were sought to enable defense counsel and plaintiff’s counsel to reach an agreement about who are the proper defendants to plaintiffs’ claims. The undersigned counsel have now prepared an answer to the complaint on behalf of LINA and the LTD plan. Counsel recently learned that LINA’s in-house attorney who is responsible for this case will be out of the office until June 23, 2008, and therefore cannot review or approve the draft answer in advance of June 19.

2. LINA and the LTD Plan therefore seek a six day-extension, up to June 25, 2008, to answer the complaint so that LINA's in-house counsel can review and comment on the answer.

3. In an email exchange on June 16, 2008, counsel for plaintiff and the co-defendant stated that they did not oppose this motion.

WHEREFORE, Defendants, LIFE INSURANCE COMPANY OF NORTH AMERICA, and YELLOW ROADWAY CORPORATION LONG-TERM DISABILITY INSURANCE PLAN, respectfully request that this Honorable Court grant them a six day extension, up to June 25, 2008, to answer plaintiff's complaint.

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Respectfully submitted:

LIFE INSURANCE COMPANY OF NORTH  
AMERICA and YELLOW ROADWAY  
CORPORATION LONG-TERM  
DISABILITY INSURANCE PLAN

By: /s/ Peter E. Pederson  
One of its Attorneys

### **CERTIFICATE OF SERVICE**

I, the undersigned attorney, certify that on June 18, 2008, I e-filed this motion using the Court's CM/ECF system, which will make a copy available to counsel of record identified below.

s/Peter E. Pederson

### **SERVICE LIST**

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